

1 Eugene P. Ramirez (State Bar No. 134865)
2 *eugene.ramirez@manningkass.com*
3 Kayleigh Andersen (State Bar No. 306442)
4 *kayleigh.andersen@manningkass.com*
5 **MANNING & KASS**
ELLROD, RAMIREZ, TRESTER LLP
801 S. Figueroa St, 15th Floor
Los Angeles, California 90017-3012
Telephone: (213) 624-6900
Facsimile: (213) 624-6999

6 Attorneys for Defendants, COUNTY OF
7 SAN BERNARDINO and DEPUTY
CHRISTOPHER ALFRED

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

1 STEFFON BARBER, an individual,
2 Plaintiff.

V.

COUNTY OF SAN BERNARDINO, a municipal entity, and DOES 1 through 10, inclusive,

Defendant

Case No. 5:22-cv-00625-KK-DTBx

*[District Judge, Kenly Kiya Kato,
Magistrate Judge, David T. Bristow]*

DEFENDANTS' PROPOSED STATEMENT OF THE CASE

Trial Date: 1/26/26

9 TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL:

20 By and through their counsel of record in this action, defendants COUNTY OF
21 SAN BERNARDINO and DEPUTY CHRISTOPHER ALFRED (collectively herein
22 after as “Defendants”) – hereby submit the following [Proposed] Joint Statement of
23 the Case to be provided to the jury panel at the time of trial, pursuant to Federal Rules
24 of Civil Procedure 16 and 51; United States District Court, Central District of
25 California Local Rules 16-2, 16-3, 16-4, 16-5, 16-6, 16-7, 16-8, 51-1, 51-2, 51-3 and
26 51-4; and the Orders of the Court (as applicable).

27 The signatory party reserves the **right to amend** this Proposed Statement of the
28 Case, subject to any objections, motions *in limine*, and pertinent Orders of the Court.

1 DATED: December 22, 2025

Respectfully submitted,

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3 **MANNING & KASS**
4 **ELLROD, RAMIREZ, TRESTER LLP**
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6 By: /s/ Kayleigh Andersen

7 Eugene R. Ramirez

8 Kayleigh A. Andersen

9 Attorneys for Defendants, COUNTY OF
10 SAN BERNARDINO and DEPUTY
11 CHRISTOPHER ALFRED



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1 **JOINT STATEMENT OF THE CASE**

2 This civil lawsuit arises out of an incident that occurred on April 27, 2021 in
3 Adelanto, California between Defendant San Bernardino Sheriff's Department
4 Deputy Christopher Alfred and Plaintiff Steffon Barber. On that date, Deputy Alfred
5 responded to a call for service at Mr. Barber's residence, and a deputy-involved
6 shooting occurred. Mr. Barber contends that Deputy Alfred used excessive and
7 unreasonable deadly force, was negligent in his conduct with Mr. Barber, and acted
8 with reckless disregard for Mr. Barber's constitutional right to be free from
9 excessive force. Plaintiff seeks damages to the extent permitted by law.

10 Defendants County of San Bernardino and Deputy Alfred contend that Mr.
11 Barber posed an immediate threat to Deputy Alfred when he reversed his vehicle in
12 Deputy Alfred's direction. Defendants contend that Deputy Alfred used only
13 objectively reasonable force under the totality of the circumstances. Defendants
14 deny the nature and extent of Plaintiff's claimed damages.



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